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6 Attorneys for Third Party Brian Dubinsky

7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10

11 MARK GRANTHAM,
12

13 Plaintiff,

14 v.

15 WAL-MART STORES, INC., an
16 Arkansas corporation,

17 AND

18 SLB TOYS USA, INC. d/b/a TOY
19 QUEST, a New York corporation,
20

21 AND

22 MANLEY TOYS LTD, a Hong Kong
23 corporation,

24 Defendants.
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27
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Case No. CV11 80 182 MISC

(Action pending in the United States
District Court for the Western District
of Missouri Southern Division Case No.
08-3466-CV-S-GAF)

DISCOVERY MATTER

**STIPULATION AND [PROPOSED]
ORDER ON MOTION TO QUASH
THIRD PARTY SUBPOENA
SERVED ON LITTLER
MENDELSON, P.C.**

STIPULATION AND [PROPOSED] ORDER ON MOTION TO QUASH THIRD PARTY
SUBPOENA SERVED ON LITTLER MENDELSON, P.C.

1 2. Counsel for Brian Dubinsky will deliver all privilege/privacy logs that
2 were created in the *Sefchick* case to counsel for SLB.

3 3. SLB will be responsible for removing all documents listed on the
4 privilege/privacy logs from the set of documents and/or electronic media that will be
5 produced to Grantham.

6 4. Prior to producing the documents and/or electronic media to Grantham,
7 SLB shall provide a copy of the proposed production to the undersigned counsel for
8 Brian Dubinsky. Counsel for Mr. Dubinsky will have two weeks to review the
9 proposed production to confirm that no privileged/private documents will be
10 produced to Grantham.

11
12
13 Dated: September 19, 2011

VALLE MAKOFF LLP

14
15 By: _____

16 Jeffrey B. Valle
17 Attorneys for Third Party
18 Brian Dubinsky

19 Dated: September 19, 2011

EWING & EWING P.C.

20
21 By: _____

22 R. Craig Ewing
23 Attorneys for Mark Grantham
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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
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13 Plaintiff,
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DISCOVERY MATTER

**[PROPOSED] ORDER ON MOTION
TO QUASH THIRD PARTY
SUBPOENA SERVED ON LITTLER
MENDELSON, P.C.**

1 Upon consideration of the stipulation filed by Third Party Brian Dubinsky
2
3 and Plaintiff Mark Grantham, by and through their respective attorneys, it is hereby
4 ordered as follows:

5
6 1. Littler Mendelson, P.C. will deliver its response to the Littler Subpoena
7 to John S. Sandberg, counsel for SLB Toys USA, Inc. ("SLB"), who is located at
8 Sandberg Phoenix & von Gontard P.C., 600 Washington, 15th Floor, St. Louis,
9 Missouri 63101. Littler Mendelson, P.C., will also deliver its response to the Littler
10 Subpoena to Jeffrey B. Valle, counsel for Brian Dubinsky, Valle Makoff LLP, 11911
11 San Vicente Blvd., Suite 324, Los Angeles, California 90049.

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13 were created in the *Sefchick* case to counsel for SLB.

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18 SLB shall provide a copy of the proposed production to the undersigned counsel for
19 Brian Dubinsky. Counsel for Mr. Dubinsky will have two weeks to review the
20 proposed production to confirm that no privileged/private documents will be
21 produced to Grantham.

22
23 IT IS SO ORDERED.

24
25 Dated: 9/21/11



26
27 Hon. Susan Illston
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